

**West Mojave Plan  
Task Group 2  
Green Tree Inn, Victorville  
February 19, 2002**

**Attendees**

**Task Group:** Steve Boland, Marie Brashear, Paul Condon, Jeri Ferguson, Jennifer Foster, Ken Foster, Martin Gill, Ted Kalil, Peter Kiriakos, Paul Kober, David Matthews, Lorelei Oviatt, Doug Parham, Steve Smith, Robert Strub, Barbara Veale, Ed Waldheim, Chuck Williams, Jim Wilson.

**West Mojave Team:** Bill Haigh, Larry LaPre, Ed LaRue, Valery Pilmer.

**Introductions**

Bill Haigh opened the meeting at 6:15 PM and introductions were made. Haigh asked that participants review the meeting notes from the last meeting and let him know if any changes are needed. Haigh noted that BLM staff are still unable to use the internet and the BLM internet site is likely to remain down for a few more weeks.

Haigh provided information regarding the schedule for the West Mojave Plan. He noted that the judge reviewing the Center for Biological Diversity (CBD) lawsuit stated that he expects all settlement deadlines to be met. The settlement deadline for the Record of Decision for the West Mojave Plan is June 30, 2003. In order to meet this date, the West Mojave Plan strategy, including route designation, must be completed by mid April 2002. Jeri Ferguson indicated that in the settlement discussions, CBD wanted interim closures for the entire West Mojave, but backed off to five subregions with the contingency that the remainder would be completed by June 30, 2003. Haigh explained that the conservation strategy needs to be completed by April 2002 to allow time for scoping, writing of the plan and the Environmental Impact Report and Statement (EIR/S), and public review of the plan and EIR/S. Haigh indicated that comments would be considered up until June 30, 2003. The following issues were raised:

- Jeri Ferguson asked how route designation would be completed for the subregions and conservation areas where the detailed ground survey has not been completed. Bill Haigh responded that BLM staff will have to use the best information available for these outlying areas, including route designation done in the past for Areas of Critical Environmental Concern (ACEC) and the Denver aerial inventory. The field survey teams will be working until mid-March 2002 to complete the Tortoise DWMA's, Middle Knob and a couple of other areas. Nine subregions have been field surveyed. Ferguson noted that maps of the remaining subregions with the Denver inventory have not been reviewed by the public. Ferguson noted that she had asked for a complete set of maps last year, and now it appears there will not be time to review them before decisions are made. Marie Brashear

asked that the routes be put on 7 ½ or 15 minute quads, and that they be made available on a CD. Jeri Ferguson indicated she wants a set of 7 ½ minute quads burned on a CD. Haigh indicated that once the surveys are complete, staff will provide CDs which will include the field survey data for the nine subregions, the Denver inventory for the remaining subregions, and route designation completed for ACECs and other areas.

- Bob Strub recommended that a disclaimer be placed on the maps containing the Denver inventory, stating that the inventory has not been ground-truthed and that a certain percentage of the routes will not be accurate. Strub also indicated concern that the Searles Valley will not receive the benefit of a ground survey.
- Several individuals expressed concern that the more accurate field survey will not be extended to the remaining areas. Concern was expressed that routes designated as open may not exist. It was clarified that a new route designation process would take place using newly established criteria in both the field survey and Denver inventory areas. Lorelei Oviatt stated that using the Denver inventory will not work.
- Martin Gill expressed concern that a section by section analysis might result in segments of routes being closed.
- Marie Brashear noted that frequency of use is important, as infrequently used roads in tortoise habitat may not be a problem. She advocated consideration of seasonal closures, and noted that the information needed to make this assessment has not been collected.
- Jeri Ferguson noted that an appeal of the BLM action on routes is inevitable, as the information to be used will not be accurate for many of the areas, and there is insufficient time to make the information more accurate.
- Marie Brashear asked how difficult it will be to mesh the route criteria for the remaining species with Ed LaRue's proposed analysis. Bill Haigh responded that only a few of the remaining species will need additional consideration.
- Martin Gill stated that US Fish and Wildlife Service will make the important decisions, and that the biologists need to identify what they think will work, then see if the OHV community is satisfied with the result.
- Some concern was expressed that staff may not be able to designate routes in the short timeframe provided. Bill Haigh noted that a route designation effort was completed in 1985 and 1987. He indicated that it may be possible to rely upon the existing route designations in the outlying areas, and limit new route designations to areas where circumstances have changed since 1987, such as the Tortoise DWMA's and other biological hot spots. Haigh noted that nine of the twenty-one subregions have been field surveyed, including the Tortoise DWMA's with the exception of El Mirage and Pinto.

## **Sensitive Biological Areas: Application of Methodology and Identification of Conflict Areas**

Ed LaRue introduced Steve Boland, a biologist who has done many of the tortoise field surveys.

LaRue presented his approach for determining those areas with a large number of tortoises and a high level of disturbance, and noted that it is in these areas where route designation can make the most significant difference for the tortoise. LaRue indicated that disturbance data was collected at the same time as the tortoise transect data, and the information pulled into the model reflects vehicle based impacts only. LaRue referred the group to a series of maps posted on the wall and described what they illustrate. Maps show areas of disturbance, best tortoise areas and a combination of these two layers to identify the “make a difference” areas. The intent would be to concentrate any road closures in the route designation process in these areas. The following points were raised during the discussion of this item:

- Jim Wilson asked that “recreational” hot spots be identified as well. Bill Haigh noted that developing a model including this kind of recreational data was suggested to the Task Group previously. The group indicated that they would prefer to focus on roads that need to be closed for biological reasons. It was noted that Mike Ahrens had argued for including recreational information to aid in the decisions of what roads need to remain open in biological “hot spot” areas.
- Martin Gill expressed concern about focusing on areas of high use. He recommended focusing the effort on preserving already pristine areas instead and indicated that riders will continue to go where they like to go unless the routes are physically obliterated. Bill Haigh stated that he requested that LaRue try this approach as well, which could be used as an alternative in the EIR/S.
- Ed Waldheim argued in support of the EPA (Encourage, Prohibit and Allow) route designation concept. He stated that if you sign the encouraged routes and obliterate the prohibited routes, it will work. Use of the allowed routes would be reduced. Waldheim indicated this works better and is more cost effective than trying to physically close a very large number of routes.
- Paul Kober stated that people will use the route that is maintained. If a route is not maintained, people will switch to other routes which can give rise to route proliferation. Marie Brashear noted that while this may be the case for motorcycle riders, it is not the case for 4-wheel drive clubs who want a challenging driving experience.
- Peter Kiriakos called for putting priority on protecting areas with good tortoise habitat, not just high tortoise sign. Kiriakos also called for being more severe with closures since some people tend to ignore them.

- Steve Smith asked whether criteria would be developed for other issues related to route designation such as cultural. Bill Haigh responded that he has asked Les Weeks to work on this additional criteria.
- Lorelei Oviatt asked that one of the EIR/S route designation alternatives be based solely upon biological criteria. Oviatt wants to be able to identify which routes need closure for biological reasons.
- Peter Kiriakos asked that criteria be used consistently across all the polygons and that funds be used to obliterate closed routes. Steve Smith indicated that there is a whole range of alternatives to restore routes, and indicated that the goal is to make the line of sight as natural as possible. Smith indicated that perennials can come back in a couple of years if the roots are still there, and that hill climbs are very difficult to restore.
- Marie Brashear asked how difficult it will be to combine LaRue's analysis with what Larry LaPre develops for other species. LaPre indicated that it will not be too difficult.
- Jeri Ferguson thinks it will be difficult to get buy-in, and that staff should simply proceed, and get the maps out for the OHV community and others to review. She is concerned that it will be hard to put together a network based on good sound data in two months. Ferguson recommended keeping the maps simple, and using the 7 ½ topo maps as the base. Lorelei Oviatt concurred that staff should move forward, and emphasized that the group is not saying that the approach is a great idea.
- Bill Haigh noted that Les Weeks will work on the remaining criteria which will be discussed at the next Task Group 2 meeting. Jeri Ferguson noted that the group needs to see definitions for the remaining criteria.
- Ed Waldheim asked about the headstarting program. Ed LaRue indicated that staff is pursuing this, and that a pilot program is being considered near Fremont Peak, in an area that historically had high tortoise numbers. Bill Haigh noted that headstarting has been adopted as a measure by Task Group 1. Paul Kober stated that where headstarting is done should be open to group discussion. It was noted that Task Group 1 was the appropriate place to discuss this issue.

### **Next Meeting Date**

The next meeting date for Task Group 2 was set for Thursday, March 21, 2001 at the Green Tree Inn, Victorville, from 6 p.m. until 9 p.m..

### **Presentation by Doug Parham**

Doug Parham read a letter to the group, a copy of which is attached to these meeting notes.

Parham indicated that he is appealing to Task Group 2 to control OHV use near his house. The following points were raised during the discussion on this item:

- Jim Wilson asked how many residences were within a 2 mile radius of the affected area. Parham responded that there are three inhabited dwellings. Parham also indicated that there are 50 members in his landowner's association.
- Bob Strub asked what the land values are in the area. Parham responded \$500 per acre.
- Lorelei Oviatt asked when Parham purchased his home and whether Parham had contacted the Sheriff regarding the problems. Parham responded that the home was purchased seven years ago and that the Sheriff had been contacted 50 times in the past year. Oviatt indicated that while she appreciates his problem, she is not sure BLM is obligated to close routes because people live near them. Parham indicated that people use the public land as a trailhead to go on private land, and asked that the area be closed so it will no longer be used as a trailhead.
- Martin Gill suggested the association consider fencing the property. Parham responded that they are considering that.
- Marie Brashear noted that the Drug Enforcement Agency pays part of BLM ranger salaries. Because of this, much of their work involves drug enforcement, and now anti-terrorism security, which means less time for enforcing regulations related to OHV use. She hopes this changes in the future.
- Doug Parham asked for a vote to close Edwards Bowl. It was noted that it is not part of the rules of the Task Group to vote on such issues.
- Mike Ahrens noted that there are problems at the Edwards Bowl area which is outside the zone of influence of the El Mirage Plan. Ahrens added that law enforcement patrols are increasing in the area, and that BLM is working in the same direction as the property owners. He asked that the association wait to see the results of current BLM management in the area and indicated he would share Parham's letter with Tim Read and Harold Johnson.

The meeting adjourned at 9:20 PM.

February 19, 2002

Dear Members of the Task Group II of the West Mojave Plan,

The following is an appeal for relief from OHV trespass in the Edwards Bowl Area of the El Mirage Valley. The area is mixed public and private ownership with a large percentage of absentee landowners. The issue of OHV trespass was addressed by the El Mirage Cooperative Management Area signed in August 1990.

## I. History:

For over 30 years, the Edwards Bowls area of the El Mirage valley has been used as a casual OHV play area. This area is located on public and private lands in Township 8 N Range 7 W San Bernardino Meridian. Uncontrolled trail proliferation and OHV associated vandalism, noise and habitat degradation throughout the El Mirage Valley led to the establishment in 1990 of the El Mirage open area as a way to draw OHV play into a controllable area.

"The (El Mirage) Management Area is the result of the efforts by several parties to resolve issues brought to the forefront by a variety of groups. Issues were identified at public meetings and involved input from user groups, landowners, adjacent residents...as well as the general public. The following is a list of the major issues that this Management Plan will address:

### NUMBER ONE (emphasis added):

OHV trespass and associated impacts such as trail proliferation, noise, dust, visual pollution, crop damage, and traffic congestion on private roads are excessively degrading to the environment and disturbing to the local residents." (EL Mirage Plan p.7)

"In the long-term, the reasonable foreseeable scenario for the no action alternative would be an organized effort on the part of the nearby communities to shut the area down to OHV use. Trespass and the associated problems are such that the surrounding communities have demanded a change to the existing situation. The vehicle access designation would most likely be closed on all the public land around the lakebed to reduce OHV related problems. The lakebed itself is not large enough to provide opportunities for OHV play and would also have to be closed to such use."(EL Mirage Plan EA p.4)

"There is an urgent need to establish legal riding areas in Southern CA in order to focus this use to protect private property, lives, and natural resource values. El Mirage is a historical riding area and is ideally suited to provide such opportunities. The concept behind establishing such legal riding areas is to focus OHV play withing specific areas thereby removing such activity from inappropriate locations." (emphasis added)(EL Mirage Plan p.92)

## II. Purpose of El Mirage Plan

The purpose of the El Mirage Plan is to provide opportunities for motorized recreation and to contain OHV play in a manageable area.

"The consequences of confining OHV play to within the final boundaries of the Management Area, and the subsequent closures of historic camping and staging areas outside the Management Area, are acceptable to both the landowners and recreationists. The proposed action represents a compromise between these two groups that are often diametrically opposed to each other. Landowners wish to confine, restrict, or abolish OHV use. Off-highway vehicle users traditionally want to open, leave open, or acquire more lands for riding opportunities." (El Mirage EA p.14)

"Fencing the perimeter of the Management Area and controlling OHV play outside of the boundaries will greatly enhance the property values in the surrounding area. This action will reestablish the quiet rural atmosphere that is preferred by the local communities." (El Mirage EA p. 16)

### III. How to Implement the El Mirage Plan

The Management area is to be managed for intensive multi-use. The Management Area is surrounded by a Zone of Influence that is closed to OHV play. 24 routes of travel have been designated in the Zone of Influence North of the Management Area and these are open to licensed vehicles only.

"Lands surrounding the Management Area shall be routinely patrolled to ensure compliance with Federal, State, and County laws and regulations relative to unauthorized off-highway vehicle use and trespass and prohibitions against take in Section 9 of the Endangered Species Act." (El Mirage-FWS p.12)

"Prior to the signing of the Management Plan, the Bureau will issue an order to close routes (any path, trail, or road used by motorized vehicles) in the Zone of Influence with the exception of the routes indicated in Figure I. This will include twelve full and two partial sections of Bureau land north of the Management Area which are immediately south of a consolidation zone, as proposed by the Bureau's Western Mojave Land Tenure Adjustment project. The routes that will remain open will be open only to street legal vehicles. This closure will remain in effect until the fence surrounding the Management Area is completed and the habitat management plan for the desert tortoise in the western Mojave Desert identifies an appropriate level of vehicular access for this area and the area south of the Edwards Air Force Base." (El Mirage -FWS p.2)

"The assumption has been made that all potential problem areas, relative to inappropriate OHV play surrounding the Management Area, are within the Zone of Influence. The area north of the zone of influence and south of Edwards Air Force Base will be closely monitored to assure that this assumption is correct." (El Mirage Plan p.12)

"Monitoring both within and around the Management Area will be an on-going effort to make sure the following issues are being satisfactorily resolved:

- (a) Trespass on private property is kept to a minimum.
- (b) Littering and trash accumulation are kept to a minimum.
- (c) Sewage is disposed of properly.
- (d) Route proliferation and adverse OHV use patterns are controlled." (El Mirage Plan p.53)

A letter written by the El Mirage Property Owners brought up the following issues:

"...In conclusion, one can sympathize with the local residents who are experiencing problems with OHV users. However, if the Park is successful, it will attract a greater number of perpetrators to the area--thus increasing the incidents of vandalism, trespass, litter, noise and theft. Several recreational riders stated at the March 31st public meeting that OHV users would not frequent a regulated area. They were opposed to paying entrance fees in addition to Green Sticker fees. They were not interested in driving their vehicles in a fenced in straight run. What provisions for control have been made to prevent the scores of OHV users from trespassing on the open available land surrounding the Management Area and Zone of Influence? The answer is NONE. The BLM has not solved the trespass problem. They've just relocated it at the expense of 1100 private landowners!" (El Mirage Plan p.115)

A response to the letter from BLM:

"A major intent of this project is to provide a fenced and controlled area for recreation use. In return surrounding lands will not be available for OHV play. This is a compromise that was worked out through the combined efforts of the local communities, the visitors to the area, San Bernardino County, The State, and the Federal Government.

Several measures are being taken to ensure that visitors to the area recreate within the Management Area. These actions include the designation of public land for intensive vehicle recreation use, the acquisition of private land, the installation of a perimeter fence, the printing and distribution of brochures, the installation of signs, the limiting of OHV opportunities on the public land surrounding the Management Area, the designation of routes in the zone of influence, patrols by law enforcement Rangers, and coordination among the BLM, the County sheriff and the Highway Patrol." (El Mirage Plan p.86)

#### IV. Edwards Bowl area.

The Edwards Bowl area has been used as an OHV play area for the past 30 years at least. According to the El Mirage Plan, OHV play was not to be allowed in this area.

"The assumption has been made that all potential problem areas, relative to inappropriate OHV play surrounding the Management Area are within the zone of influence. The area north of the zone of influence and south of Edwards Air Force Base will be closely monitored to assure that this assumption is correct." (El Mirage Plan p.12)

In a letter written to BLM by David Kay of the American Motorcyclist Assoc. Dist 37 on April 2, 1990, he states:

"The 'isolated' area to the northwest of the drylake should remain open to OHV use and should be connected to the main portion of the management area by a fenced/gated corridor. Additional lands should be acquired, where necessary to accomplish this. The small hills in this area have also been heavily used historically by motorcycles and for camping." (El Mirage Plan p.124)

The response to the letter by BLM was:



"One of the underlying reasons for creating the Management Area is that OHV play is currently occurring throughout the entire zone of influence. The area would need to encompass nearly 100,000 acres to include all the historical use areas. The cost of acquiring the private land in such an area would be prohibitive." (El Mirage Plan p.89)

In a letter written to BLM by George S. Lyle received March 21 1990, he states:

"The area between Shadow Mountain Road and Edwards Air Force Base has been used by OHVs since the 1940s. Trails and campsite locations have been established for years. There are few people residing in this area and most OHV users give them a wide berth. Since OHV activity has been established in the El Mirage area for so long, all of the present residents knew of the OHVs prior to their coming. I am unaware of any major problems caused by OHV users in this area and, if there is a problem, then the solution lies in education and enforcement, not in fencing off large areas of public land." (El Mirage Plan p.125)

The BLM response was:

"There are many constraints affecting the land north of Shadow Mountain Road that preclude allowing OHV play in this area. This includes the fact that one day Shadow Mountain Road will be paved, that most of the public land in this area is in scattered blocks intermingled with private land, that the residents in the area are fed up with trespass, that the OHV riders continue to establish new trails, that much of this land will be used as exchange base for the Land Tenure Adjustment Project, and that this area is considered valuable habitat for the desert tortoise." (El Mirage Plan p.90)

In spite of the intent of the El Mirage Plan, the reality is that in 2002, the Edwards Bows area is still intensively used as an OHV play area. There is no regularly scheduled patrol by any Law Enforcement body in spite of many emergency calls by local residents over that past 7 years. Vandalism, arson, trail proliferation, OHV trespass, dumping of sewage, unsafe firing of automatic weapons, noise, dust, pollution, disturbance of the peace and trampling of wildlife habitat are rampant.

#### ISSUES IDENTIFIED AS A RESULT OF THE EMERGENCY ROUTE DESIGNATION AT EDWARDS BOWL

In an Environmental Assessment prepared by Barstow BLM in June, 2001, the following points were made concerning the Edwards Bowl:

"The Edwards Bowl area has been used intensively for several decades. The BLM has provided minimal management of this area, instead focusing its efforts on providing for appropriate OHV recreation opportunities at the El Mirage Recreation Area. This has lead to a overall decrease of use in the Edwards Bowl area. However, the type of use (cross-country travel and travel on an extensive network of routes causing considerable adverse impacts) that continues in the area is inappropriate and unacceptable given the area's role as critical desert tortoise habitat in recovery of the desert tortoise."

"It was intended that development of the El Mirage Management Area Plan, and the associated vehicle use area, would over time result in a shift of vehicles

use and a decrease in vehicle use impacts at Edwards Bowl. To some extent, this has occurred. However, unacceptable OHV impacts to designated desert tortoise and Mojave ground squirrel habitat are continuing to occur." (Edwards Bowl EA p.1)

"...the type, intensity and frequency of vehicle use within the Edwards Bowl Planning Unit has facilitated habitat fragmentation and direct incidental impacts to tortoises and other natural resources. Completion of the WEMO plan will address these issues in time. " (Edwards Bowl EA p.1)

"OHV use dates back in this area for several decades with some recreationists claiming use of the area by three generations. Most of the recreationists that utilize this area seem to come from LA County. Unauthorized OHV use of the area has caused an extensive route network with many areas nearly denuded of vegetation causing severe deterioration of the natural habitat values." (Edwards Bowl EA p.4)

#### "PROPOSED ACTION

The proposed action would institute a closure in accordance with Title 43, Code of Federal Regulations 8364.1, of all of the public lands within the Edwards Bowl Planning Unit to motorized vehicle use; except for the routes which are identified on the enclosed map, which will be signed open and except for BLM operation and maintenance vehicles, law enforcement vehicles and other vehicles specifically authorized by the authorized officer of the BLM.

Those routes where use would be allowed would be signed Open and maintained to facilitate use. Additionally, a brochure would be prepared to explain the need for the closure, illustrate which routes are available for use, present an appropriate land use ethic, and explain how the public may participate in the formal route designation process. Formal designation of routes as Open, Limited, or Closed within the planning unit will be completed, by CDCA plan amendment, through the West Mojave Coordinated Management Plan. (WMCMP)

Public outreach, visitor contact, and law enforcement will be enhanced above their current levels to support the implementation of the closure. Sign maintenance, visitor contact and law enforcement patrols will be regularly scheduled. The purpose of visitor service contacts will be to achieve voluntary compliance of use of the signed routes. Additionally, an effort will be made to develop a force of volunteers that utilize this area to help with public outreach and sign and trail maintenance. The Barstow field office has had tremendous success achieving voluntary compliance utilizing this methodology in other areas." (Edwards Bowl EA p.9)

#### "RECREATION

Much of the use that once utilized the Edwards Bowl area has been relocated to El Mirage Recreation Area through its development. Those that do still recreate at the Edwards Bowl tend to be long-standing traditional recreationists that have utilized this area, often for several generations. Others have stated that they do not recreate at El Mirage because they enjoy the *informal management* and smaller crowds at Edwards Bowl. Implementation of the preferred action will be viewed as negative by both of these groups as it will be

a major change in a traditional recreation experience and will formalize and reduce the OHV recreation opportunity. Because of this some of these recreationists are expected to move to El Mirage while others are likely to move to other locations which cannot be determined.

On the other hand, this reduction of use and routes will benefit non-OHV recreationists in that the scenic quality of the area will increase over time. Game bird species will likely increase as disturbance decreases and habitat values increase, and the overall opportunity for recreation dependant on quiet solitude will be enhanced. The Proposed action would simplify a visitor's ability to find his/her way in the planning unit. Effective on-the-ground signing and open route berm maintenance would be beneficial in directing travelers within the open route network to where they want to go. Future agency outreach efforts, including strategically placed kiosks with area information and maps, as well as regular ranger visitation, would be provided. Visitors would still be responsible for knowing the rules and regulations relevant to public lands, including those related to vehicle travel.

## SCENIC RESOURCES

By reducing the size of the available route network and possibly the number of OHV recreationists, the opportunity for impacts to scenic resources will decrease. Additionally, implementation of the proposed action will decrease cross-country OHV use also decreasing scenic resources impacts. Natural revegetation will increase as use decreases. Formal route designation will be completed through the WMCMP plan, which will include direction for implementation including active revegetation and open route maintenance.

## IMPLEMENTATION STRATEGY:

### Patrolling

Patrolling by law enforcement, recreation, and visitors services personnel is a high priority task because such patrols help minimize damage to cultural and recreational resources, as well as sensitive plant and wildlife species. Visitor Service and Recreation Staff would patrol open routes to make outreach contacts with visitors, to install and repair signs, and to remedy any non-compliance with the route network (e.g., rake out or disguise OHV tracks on closed routes). They would also identify where maintenance is needed, where violations are occurring, and collect other information on specific routes.

### Sign Implementation

- All routes available for use would be signed as open.
- signs stating "Motorized Vehicle Travel Limited to Routes Signed Open" will be installed at all major entrances and at congregation areas.
- A kiosk will be constructed to display important information including a map of open routes, information regarding the Desert Tortoise, "Pack it in Pack it out", rules for shooting, Tread Lightly/Leave No Trace land use ethic, and information regarding other appropriate places for OHV recreation.
- Junctions of closed routes would not need signs, except in unusual circumstances." (Edwards Bowl EA p.20)

In October, 2001, the following restrictions were ordered by Tim Read, Manager of the Barstow Field office of the BLM:

"Implementation of the temporary restriction will include signing and maintaining Open routes as well as preparation and distribution of a brochure to explain the need for the closure, illustrate which routes are available for use, present an appropriate land use ethic, and explain how the public may participate in the formal route designation process. Implementation will also include enhanced public outreach, visitor contact, and law enforcement above current levels. Sign maintenance, and visitor contact and law enforcement patrols will be regularly scheduled. The purpose of visitor service contacts will be to achieve a voluntary compliance of use of the signed routes. Additionally, an effort will be made to develop a force of volunteers that utilize this area to help with public outreach and sign and trail maintenance."(Decision record for Edwards Bowl p.2)

#### ON-THE-GROUND REALITY OF EDWARDS BOWL CLOSURE IMPLEMENTATION.

As of February 18, 2002, the open routes have been signed. No brochure has been made available. BLM informational signs have fallen into disrepair and have suffered from vandalism. In spite of repeated calls to Barstow Field Office, no one has come to maintain the signs. Visitor contact and law enforcement is non-existent at the Edwards Bowl. OHV riders continue to camp and ride anywhere in the area without regard to the "open route" signs, including trespassing on neighboring, signed private lands. Trash dumping and illegal shooting continue unabated.

The route network proposed by the Edwards Bowl Environmental Assessment is ill advised because;

- OHV routes are indicated "open" into the Zone of Influence of the El Mirage Management Area--an area that is closed to OHV use.
- OHV routes are indicated "open" across neighboring private lands. The routes are getting wider and trail proliferation is extending beyond the Edwards Bowl Planning Unit.
- In April of 2001, vandals burned a privately owned trailer that was parked on a section road in the Edwards Bowl designated route network. The wreckage of the trailer still stands in the middle of a signed "open" route, posing threat of serious accident to an OHV user following the designated, signed route. This has been called to the attention of Barstow BLM personnel who advised us to move it ourselves as it was on private property.
- In spite of the proposed action calling for signs stating "Motorized Vehicle Traffic Limited to Routes signed as Open", this was not called for in the Decision of Record. Thus, OHV users are not made aware of the fact that routes not indicated as open are in fact closed.
- The route network invites circle races around private residences in the area of section 17, causing nuisance, dust, noise, route widening and trail proliferation.

As landowners in the Edwards Bowl area, we are frustrated with the lack of supervision and law enforcement of OHV recreation in our area. We have tried to understand the various plans and actions and decisions that have come about over the past dozen years regarding OHV use in the area. All we can discern is that the proposed plans, rules, decision and laws have not been implemented and that OHV land abuse continues unabated.

We now call upon the Route Designation Committee of the West Mojave Plan to close the Edwards Bowl area to all OHV recreation. With this simple act, it may be possible to control OHV land abuse in the area without expending unavailable resources on patrols, signs, kiosks, etc. After all, OHV recreation has been

given a 24,000 acre supervised free play area just 5 miles away at El Mirage. We as neighboring landowners and the rest of the American people who with us share ownership interests in the public land areas of the West Mojave respectfully request that this area be given a rest from OHV recreation, that resource values be protected for endangered species and that the quiet rural atmosphere that is preferred by local communities be reestablished.

Douglas Parham, President  
Western San Bernardino County Landowner's Assoc.